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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL ITS OPPOSITION TO
DEFENDANTS' MOTION IN LIMINE TO
EXCLUDE TESTIMONY OF DR.
HESSELINK REGARDING
PROTECTIONS OF WAYMO'S
ALLEGED TRADE SECRETS AND
EXHIBIT THERETO**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of its Opposition to Defendants’ Motion in Limine to
7 Exclude Testimony of Dr. Hesselink Regarding Protections of Waymo’s Alleged Trade Secrets
8 (“Waymo’s Opposition”). Waymo’s Administrative Motion seeks an order sealing the following
9 materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Opposition	Highlighted portions	Waymo (green highlighting)
Exhibit 1 to Newton Declaration	Highlighted portions	Waymo (green highlighting)

13 3. Waymo’s Opposition contains or refers to confidential business information, which
14 Waymo seeks to seal. Specifically, Waymo’s Opposition and Exhibits 1 (portions highlighted in
15 green) contain confidential information regarding Waymo’s security measures and protocols,
16 including details regarding access to Waymo’s trade secrets. The public disclosure of this information
17 would cause significant competitive harm to Waymo, as its security measures and computer forensics
18 methods would become known to competitors who could use such information to Waymo’s
19 disadvantage. If such information were made public, I understand that Waymo’s competitive standing
20 would be significantly harmed. Waymo’s request to seal is narrowly tailored to only the confidential
21 information.
22

23 I declare under penalty of perjury under the laws of the State of California that the foregoing is
24 true and correct, and that this declaration was executed in San Francisco, California, on September 22,
25 2017.

26 By /s/ Felipe Corredor

27 Felipe Corredor
28 Attorneys for WAYMO LLC

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Felipe Corredor.

/s/ Charles K. Verhoeven
Charles K. Verhoeven